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2004-18998-7

October 18, 2004

RE: Docket No. FAA-2004-18998; Directorate Identifier 2003-NM-253-AD

Docket Management Facility
US Department of Transportation
400 Seventh Street SW.
Nassif Building, Room PL-401
Washington, DC 20590

FAA-2004-18998-7

Dear Madam or Sir:

FAA proposes to supersede an existing airworthiness directive (AD) pertaining to C&D Aerospace Reinforced Cockpit Doors for certain transport category aircraft. We have reviewed the applicable NPRM and have the following comments.

1. The Cost of Compliance section and the New Requirements of This AD section Table 3 identify C&D Service Bulletin B251200-52-01 as an Alert SB. This SB was not issued as an Alert SB.
2. The Applicability section Table 1 identifies Boeing 757-200 and -300 series aircraft as applicable to STC No. ST9514LA-T. The applicable STC for these model aircraft is STC No. ST01334LA.
3. The Modification section Table 2 identifies C&D Service Bulletin B211200-52-02, Revision 1, dated June 3, 2003. The latest version of this SB is Revision 2, dated Sept. 29, 2003. Modifications accomplished per Revision 2 are identical to those in Revision 1 and should be considered as the latest SB version acceptable for compliance.
4. The Modification Accomplished Per Previous Issues of Service Bulletin section paragraph (g)(3) lists C&D Aerospace Service Bulletin B211200-52-02, dated April 30, 2003 as considered acceptable for compliance with the actions required under the existing AD. Modifications accomplished per Revision 1, dated June 3, 2003 are identical to those in the original SB and should be considered as the latest SB version acceptable for compliance.
5. The New Requirements of This AD section Table 3 lists C&D Aerospace Service Bulletin B211200-52-01 Revision 3 dated Sept. 18, 2003 as showing actions required for compliance with the proposed AD. Modifications accomplished per the original SB dated Feb. 27, 2003, Revision 1 dated March 7, 2003, and Revision 2 dated June 3, 2003 are identical to those in the Revision 3 SB and should also be considered acceptable for compliance.
6. The New Requirements of This AD section Table 3 lists C&D Aerospace Service Bulletin B221200-52-01 Revision 1 dated June 27, 2003 as showing actions required for compliance with the proposed AD. Modifications accomplished per the original SB dated April 30, 2003 are identical to those in the Revision 1 SB and should also be considered acceptable for compliance.



7. The New Requirements of This AD section Table 3 lists C&D Aerospace Service Bulletin B221001-52-03 Revision 3 dated March 25, 2003 as showing actions required for compliance with the proposed AD. Modifications accomplished per the original SB dated Dec. 6, 2002, Revision 1 dated Jan. 2, 2003, and Revision 2 dated Feb. 20, 2003 are identical to those in the Revision 3 SB and should also be considered acceptable for compliance.
8. The New Requirements of This AD section Table 3 lists C&D Aerospace Service Bulletin B231001-52-02 Revision 4 dated March 19, 2003 as showing actions required for compliance with the proposed AD. Modifications accomplished per the original SB dated Dec. 6, 2002, Revision 1 dated Jan. 2, 2003, Revision 2 dated Feb. 20, 2003, and Revision 3 dated March 7, 2003 are identical to those in the Revision 4 SB and should also be considered acceptable for compliance.
9. The New Requirements of This AD section Table 3 lists C&D Aerospace Service Bulletin B211200-52-02 Revision 1 dated June 3, 2003 or Revision 2 dated Sept. 29, 2003 as showing actions required for compliance with the proposed AD. Modifications accomplished per the original SB dated April 30, 2003 are identical to those in the Revision 1 and 2 SB and should also be considered acceptable for compliance.
10. The Model 737-200 Series Airplanes: Wiring Modification/Inspection section paragraph (l)(1) lists C&D Aerospace Alert Service Bulletin B221001-52A05 Revision 2 dated June 19, 2003 as showing actions required for compliance with the proposed AD. The latest version of this SB is Revision 3, dated Oct. 3, 2003. Modifications accomplished per Revision 3 are identical to those in Revision 2 and should be considered as the latest SB version acceptable for compliance. In addition, modifications accomplished per the original SB dated April 17, 2002, Revision 1 dated May 14, 2003, and Revision 2 dated June 19, 2003 are identical to those in the Revision 3 SB and should also be considered acceptable for compliance.

C&D Aerospace supports the intent of the rulemaking and feels that including all Service Bulletin revisions containing acceptable means of compliance directly in the AD will provide airline operators increased flexibility in showing compliance while reducing the burden to obtain separate FAA approvals for Alternate Methods of Compliance.

C&D Aerospace appreciates your consideration of these comments.

Sincerely,

Brad Christensen
Director of Certification
C&D Aerospace